

Ira S. Sacks
Mary L. Grieco
Safia A. Anand
DREIER LLP
499 Park Avenue
New York, NY 10022
(212) 328-6100

Lisa T. Simpson
ORRICK, HERRINGTON & SUTCLIFFE LLP
666 5th Avenue
New York, NY 10103
(212) 506-5100

Attorneys for Plaintiff/Counterclaim Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
:
:
SANEI CHARLOTTE RONSON LLC, :
:
Plaintiff/Counterclaim Defendant, : Civil Action No. 07CV9578 (RWS)(DCF)
:
:
-against- :
:
: **NOTICE OF MOTION FOR**
:
SANCTIONS
:
:
GMA ACCESSORIES, INC., :
:
Defendant/Counterclaim Plaintiff :
-----x

PLEASE TAKE NOTICE, that Plaintiff/Counterclaim Defendant, Sanei Charlotte Ronson LLC (“Ronson”), upon filing of the accompanying Declarations of Ira S. Sacks and Warren Singh, dated April 11, 2008, and the exhibits attached thereto, will move this Court before the Honorable Debra C. Freeman, United States Magistrate Judge, United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order pursuant to Federal Rule of Civil Procedure Rule 37, 28 U.S.C. § 1927 and the inherent power of the Court, imposing sanctions on John Bostany, the Bostany Law Firm and

Defendant/Counterclaim Plaintiff GMA Accessories, Inc., and for such other relief as the Court deems just and proper.

Dated: New York, New York
April 11, 2008

DREIER LLP

/s/ Ira S. Sacks

Ira S. Sacks
Mary L. Grieco
Safia A. Anand
Dreier LLP
499 Park Avenue
New York, NY 10022
(212) 328-6100

Lisa T. Simpson
Orrick, Herrington & Sutcliffe LLP
666 Fifth Avenue
New York, NY 10103
(212) 506-5100

Attorneys for Sanei Charlotte Ronson LLC